

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

2021 MAY 24 AM 9:09

IN THE UNITED STATES DISTRICT COURT
FOR THE

CLERK

BY

DEPUTY CLERK

(1) Jamal Hall 12296-082
(Name of Plaintiff) (Inmate Number)FCI Allenwood - medium
P.O. Box 2000 White Deer, PA 17887
(Address)(2) _____
(Name of Plaintiff) (Inmate Number)

(Address)

(Each named party must be numbered,
and all names must be printed or typed)

vs.

2:21-cv-130
(Case Number)

CIVIL COMPLAINT

(1) Vermont State Police(2) Rutland Police Department(3) _____
(Names of Defendants)(Each named party must be numbered,
and all names must be printed or typed)TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

N/A

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies at each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ____ Yes ____ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ____ Yes ____ No
- C. If your answer to "B" is Yes:
1. What steps did you take? _____

 2. What was the result? _____

- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

- (1) Name of first defendant: Vermont State Police
Employed as Trooper at 45 State DR
Mailing address: Waterbury, VT 05671-1300
- (2) Name of second defendant: Rutland City Police Department
Employed as Police at 103 Wales St
Mailing address: Rutland, VT 05701
- (3) Name of third defendant: _____
Employed as _____ at _____
Mailing address: _____

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. Rutland, Vermont Police Department (Hereinafter)
("RPD"). On 08-02-18, officer R. Ashes and others
upon detention and arrest of plaintiff, used

Excessive force by way of "TASER" Electronic

2. Control Device ("ECD"); Shot multiple times at plaintiff and at close range. Shot excessive shots into plaintiff's body causing permanent nerve damage to plaintiff, The RPD and other law enforcement
 3. physically assaulted plaintiff and used derogatory racial remarks to plaintiff while engaging in the assault by plying plaintiff legs apart to do a "Rectum Search." Plaintiff's 14th & 4th amendment to the Const-
- (continuation.)

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Plaintiff wish to proceed to trial. Plaintiff is seeking substantial amounts of compensation due to his injuries.
2. Plaintiff also request that the court would order the clerk of court to send plaintiff a application for "pro Bono" appointment of counsel due to the severity of the isolation the plaintiff is under
3. Due to the Covid-19 person lock-down.

itution was violated by the RPD. The Rutland County Police Department has the responsibility of the training and compliance with the laws, and Regulation of its employee's.

State trooper of VT. Police Department is responsible for the training of its employees. Vermont state trooper "Christopher Loyzelle" and others Vermont State Trooper violated the Constitutional Rights of this plaintiff. Vermont State troopers violated the 4th Amendment to the Constitution when they participated in the use of excessive force by way of using a "taser" - a Electronic Control Device (ECD). The Vermont State trooper Department on 08-02-18, also used excessive force by participating in a physical assault by forcing, Grabbing, prying my legs apart to do a "Rectum" search. The Vermont state police Department used pretextual tactics based on

discriminatory practices in violation of the 14th Amendment to the constitution, Officer Christopher Layzelle and others used his Drug task force experience to discriminatory use my color (African American) sex (male) and Geographical area (New York City) to cause the violent assault upon me by looking in my rectum for drugs that were not part of the investigation or incident.

- (a) If the answer is "yes," are you now seeking relief because you are under imminent danger of serious physical injury?

Yes _____ No ✓

- (b) Please explain in detail why you are under imminent danger of serious physical injury:

N/A

4. (a) Are you presently employed at the Institution? Yes _____ No ✓

(b) If yes, what is your monthly compensation? \$ _____

5. Do you own any cash or other property; have a bank account; or receive money from any source? Yes _____ No ✓

If the answer is "yes" to any of the above, describe each source and the amount involved.

N/A

I certify under penalty of perjury that the foregoing is true and correct:

Executed on 04-1-2021
(Date)

Jamal Hall
(Signature of Plaintiff)

This certification is executed pursuant to Title 28, United States Code, Section 1746.